

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
YUETING JIA, <sup>1</sup>	)	Case No.: 19-12220 (KBO)
	)	
Debtor.	)	

Objection Deadline: December 11, 2019 at 4:00 p.m. (ET)  
Hearing Date: December 18, 2019 at 10:00 a.m. (ET)

**NOTICE OF DEBTOR'S MOTION TO (I) RETAIN PQBDN LLC TO PROVIDE  
THE DEBTOR A CHIEF RESTRUCTURING OFFICER AND (II) DESIGNATE  
ROBERT MOON AS CHIEF RESTRUCTURING OFFICER FOR THE  
DEBTOR *NUNC PRO TUNC* TO NOVEMBER 17, 2019**

TO: (a) the U.S. Trustee for the District of Delaware; (b) the Committee; (c) the parties included on the Debtor's list of the twenty (20) largest unsecured creditors; and (d) all parties who have filed a notice of appearance and request for service of papers pursuant to Bankruptcy Rule 2002.

**PLEASE TAKE NOTICE** that on November 27, 2019, the above-captioned debtor and debtor in possession (the "Debtor"), filed the *Debtor's Motion to (I) Retain PQBDN LLC to Provide the Debtor a Chief Restructuring Officer and (II) Designate Robert Moon as Chief Restructuring Officer for the Debtor Nunc Pro Tunc to November 17, 2019* (the "Motion") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the "Bankruptcy Court"). A copy of the Motion is attached hereto.

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the entry of an order with respect to the relief sought in the Motion must be filed with the Bankruptcy Court on or before **December 11, 2019 at 4:00 p.m. prevailing Eastern Time.**

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<sup>1</sup> The last four digits of the Debtor's federal tax identification number are 8972. The Debtor's mailing address is 91 Marguerite Drive, Rancho Palos Verdes, CA 90275.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (a) proposed counsel to the Debtor, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705 (Courier 19801), Attn: Richard M. Pachulski, Esq. (rpachulski@pszjlaw.com) and James E. O'Neill (joneill@pszjlaw.com), (b) the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: David L. Buchbinder ([David.L.Buchbinder@usdoj.gov](mailto:David.L.Buchbinder@usdoj.gov)).

**PLEASE TAKE FURTHER NOTICE** THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

**PLEASE TAKE FURTHER NOTICE** THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE MOTION WILL BE HELD ON **DECEMBER 18, 2019 AT 10:00 A.M. PREVAILING EASTERN TIME** BEFORE THE HONORABLE KAREN B.

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OWENS, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES  
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET,  
6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801.

Dated: November 27, 2019

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

Richard M. Pachulski (CA Bar No. 90073)

Jeffrey W. Dulberg (CA Bar No. 181200)

Malhar S. Pagay (CA Bar No. 189289)

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Proposed Attorneys for Debtor and Debtor in  
Possession